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January 23, 2023

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The Honorable Ann Marie Donio, U.S.M.J.  
United States District Court  
District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, New Jersey 08101

**Re: Eric D. Blanding vs. Borough of Woodlynne, et als.**  
**No.: 1:20-cv-20481-RBK-AMD**

Dear Judge Donio:

As you may know, this office represents the Plaintiff with regard to the above-captioned matter.

We are in receipt of Mr. Riso's letter and are in agreement. First, we were just advised that I have to appear before Judge Charney in Camden to argue a motion on February 3<sup>rd</sup> at 10:00 a.m. in another matter and thus, Mr. Blanding's deposition scheduled for 11:00 a.m. has to be rescheduled.

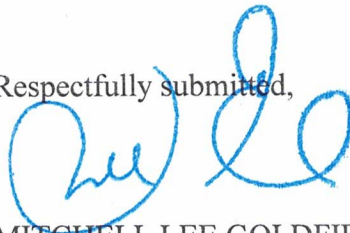
Also, upon receipt of Dr. Bernardini's report, we will be seeking a rebuttal report from Mr. Blanding's treating neurologist, Dr. Matthew McClure.

In addition, upon completion of the defendants' depositions, (which haven't been scheduled yet, as we are awaiting dates from Mr. Riso), and transmittal of their transcripts, I intend to have same reviewed by plaintiff's liability expert for the purpose of production of his report.

Finally, Mr. Blanding remains under doctor's care and was recently re-evaluated by Dr. McClure last week and I am waiting on his report to provide to Mr. Riso.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "MLG", is written over the text "Respectfully submitted,".

MITCHELL LEE GOLDFIELD

MLG/nt

Cc: Eric Riso, Esq.